

Valli Kane & Vagnini

EMPLOYEE RIGHTS ATTORNEYS

600 Old Country Road
Suite 519
Garden City, NY 11530

Tel: (516) 203-7180
Fax: (516) 706-0248
www.vkvlawyers.com

April 21, 2020

VIA ECF

The Honorable Sanket J. Bulsara
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Macas v. Alex's Auto Body 1 Inc., et al.
Dkt. No. 1:18-CV-07184 (RJD)(SJB)

Dear Judge Bulsara:

We represent Plaintiff Freddy V. Macas ("Plaintiff") in the above-captioned matter. We write jointly with Defendants Alex's Auto Body 1 Inc. and Alexander Khaimov (collectively, "Defendants") to seek an adjournment of the scheduled in-person settlement conference set for April 28, 2020 as well as the filing of any *ex parte* settlement statements.

The reason for the request is due to the COVID-19 pandemic which has resulted in an inability to effectively meet with our clients at this time. Moreover, we believe that an in-person settlement conference with the Court would most effectively move this matter toward resolution. This is our first request for an extension related to the settlement conference and Defendants consent to the request.

Thank you for your courtesies in this matter.

Respectfully Submitted,

/s/ Robert R. Barravecchio
Robert R. Barravecchio
rrb@vkvlawyers.com
Valli Kane & Vagnini LLP
600 Old Country Road

Garden City, New York 11530
Tel: (516) 203-7180
Fax: (516) 706-0248

Attorneys for Plaintiff

Cc: Counsel of record (*via ECF*)